

**From:** [Ginny Bozeman](#)  
**To:** [Litchain Corp](#)  
**Cc:** [Lawrence Flynn](#)  
**Subject:** RE: Returned Check  
**Date:** Tuesday, May 23, 2023 12:23:00 PM  
**Attachments:** [image001.png](#)  
**Importance:** High

---

Thank you for this response. At your earliest convenience, please provide me with an inventory of the 41 machines you claim to own. Include the serial number and machine type for each piece of equipment sought.

What is your current address for service of process?

Thanks,

**Ginny Bozeman**  
Senior Counsel

**DIRECT:** [\(803\) 354-4947](#)  
**CELL:** [\(901\) 299-0667](#)  
**FAX:** [\(803\) 354-4899](#)

[popeflynn.com](#) | [vCard](#)



**POPE FLYNN**  
GROUP

1411 Gervais St.  
Suite 300  
Columbia, SC 29201

**CONFIDENTIAL COMMUNICATION:** The information contained in this message may contain legally privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or duplication of this transmission is strictly prohibited. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

**From:** Litchain Corp <litchaincorp@gmail.com>  
**Sent:** Tuesday, May 23, 2023 12:16 PM  
**To:** Ginny Bozeman <gbozeman@popeflynn.com>  
**Subject:** Re: Returned Check

We will be bringing legal counsel on board very soon, as we have just recently found out that we are also being sued. That is not information that was explicitly told to us.

We are making a claim towards 41 of the machines as we were told that our machines are there as well as the deposit at the time of the cancellation of the lease of March 13th (\$637k) which was the balance after your client deducted the damages.

So we will assert our rights to obtain our machines that we were notified in an email that is where our machines were located.

On Thu, May 18, 2023 at 12:18 PM Ginny Bozeman <[gbozeman@popeflynn.com](mailto:gbozeman@popeflynn.com)> wrote:

Mr. Tate,

In follow up to the below email, please advise as to whether Litchain continues to make a claim of ownership or entitlement to any of the cryptocurrency mining equipment and other personal property left onsite at 150 Hyatt Street, Gaffney, South Carolina. If so, at your earliest convenience, please provide an inventory of the equipment you claim belongs to Litchain.

Also, please provide an updated address so that we can serve you with the attached crossclaim, filed earlier this month in the pending federal court action. The mail sent to Litchain's address on the Secretary of State's website was returned as undeliverable.

Thanks,

**Ginny Bozeman**  
Senior Counsel

DIRECT: (803) 354-4947  
CELL: (901) 299-0667  
FAX: (803) 354-4899

[popeflynn.com](http://popeflynn.com) | vCard



**POPE FLYNN**  
GROUP

1411 Gervais St.  
Suite 300  
Columbia, SC 29201

**CONFIDENTIAL COMMUNICATION:** The ~~information contained~~ information in this message may contain legally privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or duplication of this transmission is strictly prohibited. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to ~~POPE FLYNN~~ violate federal or state law.

**From:** Lawrence Flynn <[lflynn@popeflynn.com](mailto:lflynn@popeflynn.com)>

**Sent:** Friday, March 24, 2023 6:39 AM

**To:** Tony Tate <[tony@saltblog.com](mailto:tony@saltblog.com)>; Clary Phillips <[cphillips@gbpw.com](mailto:cphillips@gbpw.com)>

**Cc:** Jonathan Metcalf <[jonathanmetcalf@mac.com](mailto:jonathanmetcalf@mac.com)>; Ginny Bozeman <[gbozeman@popeflynn.com](mailto:gbozeman@popeflynn.com)>

**Subject:** RE: Returned Check

Mr. Tate

As I have requested on multiple occasions in my prior correspondence to Litchain, I need to know if Litchain is represented by legal counsel in this matter. If so, all of my communications need to be directed through that individual or firm, as the ethics rules do not allow me to correspond directly with represented parties. As a result, I ask again, please confirm whether you are represented by legal counsel or if you are negotiating on your own behalf without the assistance of legal counsel?

As to the on-site assets, Gaffney BPW has no way of knowing whether the remaining assets on the site are owned, leased or maintained by Litchain or any other party. Absent a written inventory or other direction from Litchain, as the former tenant, regarding the remaining items and direct evidence as to ownership, Gaffney BPW is unable and unwilling to make any transfer of those items. As a result, Gaffney BPW again requests that you provide us with a written inventory of the remaining assets on the leased premises and all appropriate information to determine property title/ownership of the listed items. Once received, we will make appropriate arrangements with Litchain or any other rightful owner as to their return.

Lastly, as to the Non-Disclosure and Non-Circumvention Agreement, I am uncertain why it was included in your email. Notwithstanding its irrelevance to our discussions regarding the termination of your service contract and lease, and the return of the residual assets, it is ultra vires and unenforceable under South Carolina law. If intended as some sort of threat of litigation, I would refer you to my first request above regarding your legal representation in this matter.

Thank you for your understanding in these matters,

Lawrence Flynn III

Member | Pope Flynn, LLC

**DIRECT:** [\(803\) 354-4902](tel:(803)354-4902)

**FAX:** [\(803\) 354-4899](tel:(803)354-4899)

[popeflynn.com](http://popeflynn.com) | [vCard](#)

**From:** Tony Tate <[tony@saltblog.com](mailto:tony@saltblog.com)>

**Sent:** Thursday, March 23, 2023 8:30 AM

**To:** Clary Phillips <[cphillips@gbpw.com](mailto:cphillips@gbpw.com)>

**Cc:** Jonathan Metcalf <[jonathanmetcalf@mac.com](mailto:jonathanmetcalf@mac.com)>; Lawrence Flynn <[lflynn@popeflynn.com](mailto:lflynn@popeflynn.com)>

**Subject:** Re: Returned Check

Good morning Clary,

Yes that is correct, we were attempting to cancel them based on Donnie's correspondence and transferred the money from that account in the event that we couldn't cancel in time.

So as not to confuse the issue, we are awaiting to compare, notes with the anticipated refund of deposits that our team has calculated based on the PMPA agreement and are aware that will affect the refunded amount that is \$637k+, before the appropriate credits and debits assessed and granted towards that balance.

We also understand, that your legal counsel has directed us to speak to them regarding this matter and our complete list of who owns exactly every piece equipment on the site.

Based on the the provisions set forth in NDA and NonCircumvent, we have not heard from your legal counsel after advising them of the NDA so we are unclear who they are attempting to contact, as we have asserted our rights under this and have not granted consent to discuss with outside parties.

Also, we requested a time to speak with them and have not gotten a response. We looking to resolve this matter as soon as possible; with the cooperation of your legal counsel.

Thank you for updating us with status. It is our goal to make sure that all parties receive their funds and property.

Please let your counsel know that we are more than happy to get this resolved, but we have not heard from them as to a conference to discuss.

Sincerely,  
Litchain Corp

On Thu, Mar 23, 2023 at 08:15 Clary Phillips <[cphillips@gbpw.com](mailto:cphillips@gbpw.com)> wrote:

Tony,

This email is to inform you that 2 of your recent check payments have been returned for NSF. I have attached the details of the payments and the corresponding accounts.

Clary Phillips  
Business Manager  
O: (864) 649-2194  
C: (864) 491-1326

-----Original Message-----

From: [donotreply@gbpw.com](mailto:donotreply@gbpw.com) [mailto:[donotreply@gbpw.com](mailto:donotreply@gbpw.com)]

Sent: Thursday, March 23, 2023 7:54 AM

To: Clary Phillips <[cphillips@gbpw.com](mailto:cphillips@gbpw.com)>

Subject: Scanned from a Xerox Multifunction Printer

Please open the attached document. It was sent to you using a Xerox multifunction printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location:

Multifunction Printer Name: Admin Copier

For more information on Xerox products and solutions, please visit <http://www.xerox.com>

--

Inline image

This communication (including any accompanying document(s)) is for the sole use of the intended recipient and may contain confidential information. If the reader of this message is not the intended recipient, if you have received this communication in error, or are not responsible for delivering this message to the intended recipient, please notify the sender by telephone and destroy all electronic copies of this email correspondence. Please notify us immediately by replying to the message and deleting it from your computer. Unauthorized use, distribution, disclosure or any action taken or omitted to be taken in reliance on this communication is prohibited, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited and may be unlawful. Saltbloq LLC does not waive privileged confidentiality due to inadvertent disclosure of this communication, with respect hereto

--

**Litchain Corp**

3415 W Lake Mary Blvd  
Suite 950702  
Lake Mary, FL 32795

(PH) +1.407.476.6115

**[www.LitchainCorp.com](http://www.LitchainCorp.com)**

*This communication (including any accompanying document(s)) is for the sole use of the intended recipient and may contain confidential information. If the reader of this message is not the intended recipient, if you have received this communication in error, or are not responsible for delivering this message to the intended recipient, please notify the sender by telephone and destroy all electronic copies of this email correspondence. Please notify us immediately by replying to the message and deleting it from your computer. Unauthorized use, distribution, disclosure or any action taken or omitted to be taken in reliance on this communication is prohibited, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited and may be unlawful. Litchain Corp does not waive privileged confidentiality due to inadvertent disclosure of this communication, with respect hereto.*